

Document Log Item

Addressing	
From	To
Christine Katin/R9/USEPA/US	"Konzen, Anthony CTR OASN (I&E), BRAC PMO West" <anthony.konzen.ctr@navy.mil> "Konzen, Anthony CTR OASN (I&E), BRAC PMO West" <anthony.konzen.ctr@navy.mil>
CC	BCC
Campbell.Merrifield@ttemi.com Gary.Foote@amec.com "Sullivan, James B CIV OASN (I&E) BRAC PMO West" <james.b.sullivan2@navy.mil> Kevin.Hoch@ttemi.com Marcie.Rash@ttemi.com RMiya@dtsc.ca.gov "Richard Perry" <rperry@dtsc.ca.gov> rsteenson@waterboards.ca.gov rsunga@dtsc.ca.gov	
Description Form Used: Reply	
Subject	Date/Time
RE: Site 28 - Draft Proposed Plan (PP)	12/24/2009 09:35 AM
# of Attachments	Total Bytes
0	11,957
NPM	Contributor
Processing	
Comments	

Body

Document Body

Mr. Konzen:

EPA has completed review of the Site 28 Proposed Plan (PP). In reviewing the PP, my focus was to make sure that the information would be understood by someone who is not necessarily familiar with the site or does not have a technical background. Please call or email if you have any questions about the following comments, which are provided for your consideration. Thank you for the opportunity to review the PP.

EPA comments on the Site 28 Proposed Plan

Site Background and Site Characteristics, page 1: It is not clear from the site description which Navy activities occurred on Site 28 before transfer to Caltrans that would cause elevated concentrations of metals to be present in airborne dust.

Site Characteristics, General: The Proposed Plan mentions the Phase I RI (Site 28 was not included), Phase II RI (including the “Final Validation Study for Installation Restoration Sites 8, 11, 28, and 29”) and the Phase IIB RI (“Phase IIB Remedial Investigation”). It is not really clear which investigations were site-wide and which focused on specific IRP sites and the difference between the Phase II and Phase IIB RI. It is also not clear why these particular investigations were selected to be summarized here versus others that are described further in the PP.

Summary of Site Risks, page 3: “Neither EPA nor the Office of Environmental Health Hazard Assessment has derived cancer-slope factors for the chemicals selected as COPCs in soil. Therefore, exposure to soils is not deemed to pose a potential cancer risk.” Please consider revising this text. The previous statement that “Since the detected chemicals associated with Site 28 operations were noncarcinogenic, no site-related cancer risks were calculated” may eliminate the need for this statement.

Summary of Site Risks, Human Health Risk Assessment, page 4: This section states that “Risks greater than one in ten thousand (that is, greater than 1×10^{-4}) may indicate the need for further evaluation” (underlined text is EPA emphasis). EPA does not agree with this statement. Risk is evaluated on a case-by-case basis. Although 1×10^{-4} may be used in making risk management decisions, the upper boundary of the risk range is not a discrete line at 1×10^{-4} . A specific risk estimate around 10^{-4} may be considered acceptable if justified based on site-specific

conditions; alternatively, in other cases, action may be recommended for sites within the risk management range (OSWER Directive 9355.0-30).

Human Health Risk Assessment, General comment, page 4: This section contains a lot of information that may be able to be summarized with less detail to capture the audience. For example, the paragraph on lead that defines “EPC” includes much more specific technical information than is digestible in one read. EPA defers to DTSC with respect to specific recommendations on content and language in this section.

Human Health Risk Assessment, page 4: “Site 28 is expected to continue as restricted open space.” Please explain what is meant by “restricted” here. The document states on page 9 that “The inclusion of this site in the Tidelands Trust would further restrict any future development of this site,” indicating that the restriction is beyond that which may be provided by the Tidelands Trust (underlined text is EPA emphasis). Please describe the restrictions that are beyond those listed in the “Tidelands Trust” section.

Human Health Risk Assessment, Minor comment, page 4: The LeadSpread model was used “to conservatively” predict potential blood-levels. EPA recommends modifying the description to avoid use of “conservative” in this section and the next section as it is not necessary and the meaning may not be clear (“health protective” or another definition).

Description of the No-Action Proposed Plan, General comment, page 5: The RI concluded that the physical conditions of the site make recreation or development unlikely, which contrasts with statements in previous sections about the role of the Tidelands Trust to draw people to the coast and promote recreation. Will recreation be restricted or promoted? This may confuse readers.

Christine Katin
U.S. EPA, Region 9
San Francisco, CA
(415) 972-3112

"Konzen, Anthony CTR OASN (I&E), BRAC PMO West" ---12/21/2009 11:15:20 AM---Hello All - Just a reminder that we are expecting your comments on the PP this week.

From: "Konzen, Anthony CTR OASN (I&E), BRAC PMO West" <anthony.konzen.ctr@navy.mil>
To: "Alex Naugle" <anaugle@waterboards.ca.gov>, "Brian Davis" <bdavis@dtsc.ca.gov>,
<charles_smith@dot.ca.gov>, Christine Katin/R9/USEPA/US@EPA, <Gary.Foote@amec.com>,
<michael.tymoff@sfgov.org>, <rsunga@dtsc.ca.gov>, "Richard Perry" <rperry@dtsc.ca.gov>,
<rsteenson@waterboards.ca.gov>, <RMiya@dtsc.ca.gov>, <Campbell.Merrifield@ttemi.com>
Cc: <Kevin.Hoch@ttemi.com>, <Marcie.Rash@ttemi.com>, "Dou, Wenqian"
<WDou@onesullivan.com>, <MJavaherian@onesullivan.com>, "Sullivan, James B CIV OASN
(I&E) BRAC PMO West" <james.b.sullivan2@navy.mil>, "Whitcomb, James H CIV NAVFAC SW"
<james.h.whitcomb@navy.mil>, "Clark, David J CIV NAVFAC SW" <david.j.clark2@navy.mil>
Date: 12/21/2009 11:15 AM
Subject: RE: Site 28 - Draft Proposed Plan (PP)

Hello All - Just a reminder that we are expecting your comments on the PP this week.

Regards,

Tony K.

-----Original Message-----

From: Konzen, Anthony CTR OASN (I&E), BRAC PMO West
Sent: Tuesday, November 24, 2009 16:10
To: 'Alex Naugle'; 'Brian Davis'; 'charles_smith@dot.ca.gov';
'Katin.Christine@epa.gov'; 'Gary.Foote@amec.com';
'michael.tymoff@sfgov.org'; 'rsunga@dtsc.ca.gov'; 'Richard Perry';
'rsteenson@waterboards.ca.gov'; 'RMiya@dtsc.ca.gov';
'Campbell.Merrifield@ttemi.com'
Cc: 'Kevin.Hoch@ttemi.com'; 'Marcie.Rash@ttemi.com'; 'Dou, Wenqian';
'MJavaherian@onesullivan.com'; Sullivan, James B CIV OASN (I&E) BRAC
PMO
West; Whitcomb, James H CIV NAVFAC SW
Subject: Site 28 - Draft Proposed Plan (PP)

Hello All - Please find attached the Draft "Proposed Plan for Site 28, West Side On-Off Ramps, Naval Station Treasure Island." Please submit your comments on the PP to me by Thursday, December 24 th.

Regards,

Tony K.

Anthony D. Konzen, PG 7106, CHG 850
RPM, BRAC PMO
1455 Frazee Road, Suite 900
San Diego, CA 92108
Ph: 619-532-0924
Fax: 619-532-0983